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The Northeast Utilities System

MAR | 6 2000

Docket No. 50-336 B18032

Re: ASME Section XI GL 90-05 10 CFR 50.55a(g)(6)(i)

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

### Millstone Nuclear Power Station, Unit No. 2 Relief Request from ASME Code Section XI Requirements

In a letter dated February 11, 2000,<sup>(1)</sup> Northeast Nuclear Energy Company (NNECO) requested, consistent with the guidance of Nuclear Regulatory Commission (NRC) Generic Letter (GL) 90-05, relief from the ASME Boiler and Pressure Vessel Code Section XI requirements pursuant to 10 CFR 50.55a(g)(6)(i). Attachment 1 of the above mentioned letter provided a description of actions taken by NNECO to make interim repairs on a leak in the "B" Service Water (SW) system discharge piping (line 24" -JGD-6, spool SK 923) from the Reactor Building Closed Cooling Water (RBCCW) system heat exchangers as an alternative to an IWA-4000/7000 repair/replacement. Attachment 1 also provided the supporting calculation 00-CP-02958M2, Rev. 0, "Structural Integrity Assessment of Flaw Found in Service Water Line 24"-JGD-6."

Based on the results of additional Ultrasonic (UT) examination, calculation 00-CP-02958M2 was revised to reflect the more detailed results provided by the new examination. The purpose of this letter is to provide the NRC with Revision 1 of calculation 00-CP-02958M2, "Structural Integrity Assessment of Flaw Found in Service Water Line 24"-JGD-6." The revised calculation is provided in Attachment 1.

<sup>&</sup>lt;sup>(1)</sup> Stephen E. Scace to The Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Relief Request From ASME Code Section XI Requirements," dated February 11, 2000.

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As stated in our February 11, 2000, letter permanent Code repair for this flaw is scheduled for the next refueling outage, expected to begin in April 2000.

There are no regulatory commitments contained within this letter.

Should you have any questions regarding this submittal, please contact Mr. Ravi G. Joshi at (860) 440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

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Stephen E. Scace Director - Nuclear Oversight and Regulatory Affairs

Attachment

cc: H. J. Miller, Region I Administrator
 J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2
 D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2

Docket No. 50-336 B18032

## Attachment 1

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# Millstone Nuclear Power Station, Unit No. 2

# Calculation 00-CP-02958M2, "Structural Integrity Assessment of Flaw Found in Service Water Line 24"-JGD-6," Revision 1

March 2000

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TOTAL PAGES = 26

#### 1.0 PURPOSE

The purpose of this calculation is to evaluate the structural integrity of a location of service water piping which was determined to have a service induced flaw. The service water line (24"-JGD-6), which is the discharge header for the reactor building component cooling water (RBCCW) heat exchangers, was determined to have a through-wall leak on the -5' elevation of the Unit 2 Auxiliary Building in the vicinity of the PMW pumps as described in CR M2-00-0155 (Reference 1). This calculation supports operation until a scheduled outage exceeding 30 days or refueling is reached and a code repair can be made.

Revision 1 to this calculation incorporates supplemental ultrasonic inspection data taken on 3/2/00. The supplemental data provides a more detailed characterization of the local degradation occurring in the vicinity of the leak.

#### 2.0 BACKGROUND

Generic Letter 90-05 (Reference 2) provides NRC guidance regarding flaws that exceed the code acceptance limits for piping that is in service. Specifically, it permits non-code repairs to be made to Class 3 piping systems provided that, in part, adequate structural integrity can be demonstrated. Generic Letter 90-05 also provides an analytical technique based upon linear fracture mechanics for demonstrating structural integrity.

Recently, the NRC approved use of ASME Section XI, Code Case N-513 (Reference 3) as indicated in the Federal Register dated September 22, 1999 (Volume 64, Number 183, Rules and Regulations, page 51369-51400). This Code Case also provides evaluation criteria for temporary acceptance of flaws in Class 3 piping. This Code Case is limited to moderate energy Class 3 piping and is also based upon linear fracture mechanics. However, this Code Case addresses planar flaws and has limited non-planar flaw geometry size which does not encompass a hole similar to that found in the plant.

#### 3.0 SCOPE

This calculation performs an assessment of structural integrity for the local stress conditions in line 24"-JGD-6, spool piece SK0923, at the location of the flaw. This calculation does not demonstrate design basis qualification but supports continued operation with a temporary non-structural repair. The methods employed are valid for moderate energy piping systems (design pressure < 275 psig, maximum operating temperature < 200°F).

This calculation is part of the justification for continued operation.

#### 4.0 REFERENCES

4.1 CR M2-00-0155, dated 1/18/00.

4.2 NRC Letter, "Guidance for Performing Temporary Non-Code Repair of ASME Code Class 1, 2, and 3 Piping (Generic Letter 90-05)" dated June 15, 1990.

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4.3 Case N-513, "Evaluation Criteria for Temporary Acceptance of Flaws in Class Three Piping, Section XI, Division 1," approval date August 14, 1997.

4.4 Ultrasonic Examination Straight Beam Measurements, AWO Number M2-00-00899, dated 1/19/00 (Attachment 1).

4.5 NU Calculation No. 79-176-250GP, Revision 06, "Service Water Discharge Header Problem 112," dated 8/17/99.

4.6 Ultrasonic Examination Straight Beam Measurements, AWO Number M2-00-00924, dated 1/20/00 (Attachment 2).

4.7 NU drawing 25303-20150 Sh. 106 Rev. 21, "Millstone Nuclear Power Station-Unit 2, Service Water Return From RBCCW Exchangers."

4.8 NU drawing 25303-20194 Sh. 923 Rev. 6, "Millstone Unit #2, Serv. Water Return Fr. RBCCW Exch."

4.9 USAS B31.1 - 1967, "Power Piping"

4.10 Ultrasonic Examination Straight Beam Measurements, AWO Number M2-00-03495, dated 3/2/00 (Attachment 3).

#### 5.0 ASSUMPTIONS

5.1 The flaw geometry found represents localized corrosion with a hole like appearance extending radially from the inside surface due to a defect in the lining. The through-wall hole is relatively small but the degraded thickness extends out to an approximate diameter of 3.5 inches (Reference 4.10). A flaw of 3.0 inches will be assumed and the minimum wall thickness outside the flawed region (measured by UT and approximated as 0.62 inch) will be used as the remaining pipe wall thickness.

5.2 The flaw will be assumed to be through-wall for the 3.0 inch assumed length.

5.3 A minimum pipe thickness will be calculated based upon the stress allowable limits for primary loads. This pipe thickness will be considered in selecting the flaw length "2a". The stress levels used in the flaw evaluation will be from the analysis of record provided that the actual minimum wall thickness outside the postulated flaw area is greater than 87.5% of nominal pipe thickness.

5.4 The degraded area which has a thickness less than the required minimum wall is only approximately 1 inch in diameter. When compared to the 3 inch degraded diameter analyzed in this calculation, there is available margin to safely accommodate any further degradation that may occur prior to repair at the upcoming outage.

#### 6.0 METHOD OF CALCULATION

The structural evaluation of the identified flaw will be performed in accordance with the guidance provided by Generic Letter 90-05. This method utilizes linear fracture mechanics to determine the crack driving force of the assumed crack size. In the case of piping, it postulates that the flaw is circumferentially oriented and the stresses are assumed to be bending stresses. The resultant "K" determined from the closed form solution is compared to a bounding critical stress intensity factor appropriate for the material.

The smallest value of  $t_{min}$  which satisfies the design stress conditions will be used to support selection of the  $t_{min}$  used in the flaw evaluation. Note, the stress allowables for each loading condition used in the determination of  $t_{min}$  were obtained from the pipe stress analysis of record (Reference 4.5). To characterize the flaw, a minimum pipe thickness ( $t_{meas}$ ) for use in the fracture mechanics analysis will be established based upon the minimum pipe thickness outside the postulated flaw region.

A review of the calculated stresses at the flawed location, which include the effects of dead weight, pressure, thermal expansion and safe-shutdown earthquake, was also performed. The node which is closest to the flaw will be used to obtain the stresses and loads. The other material properties and loads required for this information will be extracted from the design calculation of record (Reference 4.5).

#### 7.0 BODY OF CALCULATION

The equations used in determination of the applied stress intensity factor, K (ksi $\sqrt{in}$ ), will be computed based upon the following equations obtained from Reference 4.2 for through-wall flaws.

 $K = 1.4 * s * F * (3.1416 * a)^{0.5}$  (ksi $\sqrt{in}$ )

where;

F = the geometry factor (dimensionless)

a = the half crack length (inches)

s = the stress at the flawed location (ksi)

The geometry factor, F, is determined by the following:  $F=1 + A*c^{1.5} + B*c^{2.5} + C*c^{3.5}$ , where:

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the coefficients of the polynomial distribution are given by:

 $A = -3.26543 + 1.52784*r - 0.072698*r^{2} + 0.0016011*r^{3}$   $B = 11.36322 - 3.91412*r + 0.18619*r^{2} - 0.004099*r^{3}$   $C = -3.18609 + 3.84763*r - 0.18304*r^{2} + 0.00403*r^{3}$ and c = a/(3.1416\*R) (non-dimensional)  $r = R/t_{meas}$  (non-dimensional)

In the preceding equations for A, B and C, the variables "R" is the mean radius of the degraded pipe (inches) and the " $t_{meas}$ " is interpreted to be the minimum thickness of the pipe outside of the assumed through-wall area. The value of " $t_{min}$ " used to validate the sizing of the assumed hole will be established by back calculating the minimum thickness which satisfies stress limits of the design code. The ultrasonic inspection data from around the remainder of the section of the pipe will be reviewed to ensure that this criteria was met.

A summary of pertinent design information follows.

The flaw location is approximately six feet above the floor on the -5' elevation. Based upon review of the isometric drawing (Reference 4.7), the flaw location is spool piece SK-923 [JGD-6-20] (Reference 4.8).

Pipe Line No. 24"-JGD-6 (References 4.4 and 4.5 page 25) Design Pressure = P = 100 psig (Reference 4.5 page 25) Maximum Operating Temperature = 120°F (Reference 4.5 page 25) Pipe Size and Schedule = 24 inch schedule 40 (Reference 4.8)

Pipe OD = 24 inches, Nominal Pipe Thickness = 0.688 inches (Reference 4.5 page 35) Pipe Material = A 53 Gr B seamless steel pipe (Reference 4.8)

The  $t_{min}$  will be calculated based upon the design load combinations and the maximum allowable stress values.

The allowable stresses for the carbon steel A53, Gr. B pipe are (Ref. 4.5 sheet 62):

 Normal:
  $SE = S_h = 15,000 \text{ psi}, S_c = 15,000 \text{ psi}$  

 Secondary (Thermal)
  $S_A = 22,500 \text{ psi}$  

 Upset:
  $1.2S_h = 18,000 \text{ psi}$  

 Faulted:
  $S_v = 34380 \text{ psi}$  @  $120^\circ \text{F}$ 

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Review of the ADLPIPE model was performed to determine the correct nodal location. The vertical run of piping which contains the flaw begins at node 960 and 980 (elbow to elbow, reference 4.5 page 25). Further review (Reference 4.5, Attachment J, Sheet J12) shows that piping run 970 to 975 provides the closest elevation (4.66 ft above the floor) and consequently Node 975 represents the flaw loading conditions.

#### Normal Operation

Reference 4.9, paragraph 102.3.2, requires that the sum of the longitudinal stresses due to pressure, weight and other sustained loads not exceed  $S_h$ .

Attachment J Sheet 597 provides a longitudinal sustained stress which includes due to longitudinal pressure plus sustained load for node 975 of 919 psi. The implied moment that produces this stress (conservatively treating longitudinal pressure stress as bending stress) can be calculated as follows:

S = M/Z or M = S\*Z where;

S = stress due to longitudinal sustained load for node 975 of 919 psi M = applied moment, in-lb Z = section modulus, in<sup>3</sup>, =  $\pi (D_o^4 - d^4)/32D_o$ 

For the nominal pipe,

 $Z = \pi [(24 \text{ in})^4 - (22.624 \text{ in})^4] / (32*24 \text{ in}) = 285.5 \text{ in}^3$ 

 $M = 919 \text{ psi} * 285.5 \text{ in}^3 = 262,375 \text{ in-lb}$ 

Using the applied moment, M, and allowable stress value of 15,000 psi, the minimum diameter can be determined.

 $Z = M/S = 356,590 \text{ in-lb} / 15,000 \text{ psi} = 17.917 \text{ in}^3$ 

Solving the section modulus expression for d (in) provides;

 $d = (D_0^4 - 32D_0Z/\pi)^{1/4}$ 

 $d = [(24 in)^4 - 32^*(24 in)^*(17.917 in^3)/\pi)]^{1/4} = 23.920 in$ 

This provides a  $t_{min} = (D_0 - d)/2 = (24 \text{ in} - 23.920 \text{ in})/2 = 0.040 \text{ in}.$ 

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#### **Upset Conditions**

To determine the minimum thickness of the pipe for upset conditions, the sum of the longitudinal and bending loads including pressure, dead weight and seismic (OBE) were considered. In determining  $t_{min}$  for this loading combination, the stress allowable was 18,000 psi or 1.2 S<sub>h</sub> and the applied stresses were treated as applied bending moment.

Attachment J Sheet 597 provides a stress due to longitudinal pressure plus sustained load plus occasional loads (OBE) for node 975 of 1249 psi. The implied moment that produces this stress (conservatively treating longitudinal pressure stress as bending stress) can be calculated as follows:

$$S = M/Z$$
 or  $M = S*Z$  where;

S = stress due to longitudinal sustained load plus occasional loads (OBE) for node 975 of 1249 psi M = applied moment, in-lb

Z = section modulus, in<sup>3</sup>, =  $\pi$ (D<sub>o</sub><sup>4</sup> - d<sup>4</sup>)/32D<sub>o</sub>

For the nominal pipe,

 $Z = \pi [(24 \text{ in})^4 - (22.624 \text{ in})^4] / (32*24 \text{ in}) = 285.5 \text{ in}^3$ 

 $M = 1249 \text{ psi} * 285.5 \text{ in}^3 = 356,590 \text{ in-lb}$ 

Using the applied moment, M, and allowable stress value of 18,000 psi, the minimum diameter can be determined.

Z = M/S = 356,590 in-lb / 18,000 psi = 19.811 in<sup>3</sup>

Solving the section modulus expression for d (in) provides;

$$d = (D_0^4 - 32D_0Z/\pi)^{1/4}$$

 $d = [(24 \text{ in})^4 - 32^*(24 \text{ in})^*(19.811 \text{ in}^3)/\pi)]^{1/4} = 23.912 \text{ in}$ 

This provides a  $t_{min} = (D_0 - d)/2 = (24 \text{ in} - 23.912 \text{ in})/2 = 0.044 \text{ in}.$ 

#### Faulted Conditions

To determine the minimum thickness of the pipe for upset conditions, the sum of the longitudinal and bending loads including pressure, dead weight and seismic (DBE) were considered. In determining  $t_{min}$  for this loading combination, the

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stress allowable was 32,380 psi or  $S_y$  and the applied stresses were treated as applied bending moment.

Attachment J Sheet 623 provides a stress due to longitudinal sustained load plus occasional loads (OBE) for node 975 of 1544 psi. The implied moment that produces this stress (conservatively treating longitudinal pressure stress as bending stress) can be calculated as follows:

S = M/Z or M = S\*Z where;

S = stress due to longitudinal pressure plus sustained load plus occasional loads (DBE) for node 975 of 1544 psi M = applied moment, in-lb Z = section modulus, in<sup>3</sup>, =  $\pi (D_0^4 - d^4)/32D_0$ 

For the nominal pipe,

 $Z = \pi [(24 \text{ in})^4 - (22.624 \text{ in})^4] / (32*24 \text{ in}) = 285.5 \text{ in}^3$ 

 $M = 1249 \text{ psi} * 285.5 \text{ in}^3 = 440,812 \text{ in-lb}$ 

Using the applied moment, M, and allowable stress value of 32,380 psi, the minimum diameter can be determined.

Z = M/S = 440,812 in-lb / 32,380 psi = 13.614 in<sup>3</sup>

Solving the section modulus expression for d (in) provides;

 $d = (D_o^4 - 32D_oZ/\pi)^{1/4}$  $d = [(24 \text{ in})^4 - 32^*(24 \text{ in})^*(13.614 \text{ in}^3)/\pi)]^{1/4} = 23.939 \text{ in}$ 

This provides a  $t_{min} = (D_0 - d)/2 = (24 \text{ in} - 23.939 \text{ in})/2 = 0.031 \text{ in}.$ 

The maximum  $t_{min}$  for longitudinal stresses is 0.044 in., which is less than the Code minimum,  $t_m = 0.080$  inch (From Reference 4.9,  $t_m = P^*D_o/2(SE+P^*y)+A = 100 \text{ psi}^* 24 \text{ in.}/ 2(15,000 \text{ psi} + (100 \text{ psi}^*0.4)) = 0.080)$  required for pressure design. Therefore, the controlling  $t_{min}$  was determined to be 0.080 inch.

A flaw length (2a) of 3 inches will be assumed. Based upon review of Attachment 4, the minimum measured pipe thickness ( $t_{meas}$ ) for use in the fracture mechanics analysis can be estimated to be approximately 0.620 inch. This represents the lowest value wall thickness outside the postulated flaw area. Note that the nominal pipe thickness is 0.688 inches and 87.5% of the pipe nominal thickness is 0.602 inches

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representing the minimum manufacturers pipe thickness. Since the remaining pipe section is greater than 0.602 inch, the stresses provided by the B31.1 pipe stress analysis are adequate.

The applied stress, s, was determined from review of the B31.1 piping stress analysis (Reference 4.5). The applied stress, s, at the flawed location (Node 975) is the combination of dead weight, pressure, thermal expansion and design basis earthquake (DBE).

Dead weight + pressure + DBE = 1544 psi =1.544 ksi (Reference 4.5, Attachment J, Sh. J623)

The thermal expansion stress was obtained based upon the maximum value of bending stress from the parametric of hot run values performed in Reference 4.5. The maximum thermal stress at node 975 was determined to be "A & C Hot".

Thermal Expansion Stress = 1109 psi = 1.109 ksi (Reference 4.5, Attachment J, Sh. J240.)

The Total Applied Bending Stress, s, = 1.544 ksi + 1.109 ksi = 2.653 ksi

Computing values,

R = (24 in/2) - (0.62 in/2) = 11.69 in

r = 11.69 in / 0.62 in = 18.855 in

$$A = -3.26543 + 1.52784*18.855 - 0.072698*(18.855)^{2} + 0.0016011*(18.855)^{3}$$
  
= 10.4294

 $B = 11.36322 - 3.91412*18.855 + 0.18619*(18.855)^2 - 0.004099*(18.855)^3$ = -23.721

 $C = -3.18609 + 3.84763*(18.855) - 0.18304*(18.855)^{2} + 0.00403*(18.855)^{3}$ = 31.6959

Given a = 1.50 in, then c = 1.50 in /(3.1416\*11.69 in) = 0.040844

Calculating the Shape Factor, F,

$$F=1 + 10.4294 * (0.040844)^{1.5} + (-23.721) * (0.040844)^{2.5} + 31.6959 * (0.040844)^{3.5}$$
  
= 1.0785

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Computing K,

 $K = 1.4 \times 2.653 \text{ ksi} \times 1.0785 \times (3.1416 \times 1.50 \text{ in})^{0.5} = 8.70 \text{ (ksi} \sqrt{\text{in}})$ 

Given that the material is a ferritic steel, the lower bound fracture toughness provided by reference 4.2 is 35 ksi $\sqrt{in}$ . Since the applied stress intensity factor is less than the available fracture toughness of 35 ksi $\sqrt{in}$ , crack extension is not expected to occur and structural integrity will be maintained for all the design loads including earthquake.

#### 8.0 SUMMARY OF RESULTS

The flaw found in service water piping line 24-JGD-6, spool piece SK-923, was evaluated for structural integrity using the methods provided by Generic Letter 90-05. This method uses linear elastic fracture mechanics to determine an applied stress intensity factor using all the design loads with DBE and compares it to a lower bound fracture toughness. The applied stress intensity factor of 8.7 ksi $\sqrt{10}$  in is less than the available fracture toughness of 35 ksi $\sqrt{10}$ , crack extension is not expected to occur and structural integrity will be maintained for all the design loads including earthquake.

# Calculation Review Comment and Resolution Form

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#### **Alternative Evaluation of Non-Planar Through-Wall Flaw**

This evaluation of the subject flaw is prepared as an alternative to the evaluation performed in accordance with GL 90-05.

ASME Code Case N-597 has been accepted as an alternative by the NRC per letter dated 2/23/1999 for use on Millstone Units 2 and 3. In this case, paragraph -3500(5)(f) states that for low energy Class 3 piping exhibiting through-wall leakage, "evaluation methods and acceptance criteria shall be specified by the Owner." No further requirements are provided.

A reasonable approach for relatively small through-wall flaws in ductile piping materials is the branch reinforcement rules and acceptance criteria as given in the original construction Code, which is ANSI B31.1-1967 for this piping. The Code approach for branch connections is basically an area replacement evaluation, in which the area lost by cutting the hole for the branch piping is compensated for by existing or added reinforcing material surrounding the hole. Any pipe wall thickness not needed for pressure boundary integrity is considered available for reinforcement. A non-planar through-wall flaw is structurally similar to the lost pipe wall area cut out for a branch connection. The Code rules and criteria are specified in paragraph 104.3, "Intersections", in parts 2(b) and 2(c) and are illustrated in Figure 104.3.1(d).

For the subject flaw with an assumed effective diameter of 3.0", per 104.3(2)(b) the required reinforcing area,  $A_{reg}$  is

 $A_{req} = 1.07 t_{mh} d_1$ 

where  $t_{mh}$  is the header pipe minimum required wall thickness for design pressure, determined in this calculation as 0.080 inches, and  $d_1$  is 3.0 inches as assumed

 $A_{reg} = (1.07)(0.080)(3.0) = 0.26 \text{ inches}^2$ 

The available reinforcing area, considering both sides of the flaw, is calculated as

 $A_1 = (d_2)(T_h - mill tolerance - t_{mh})$ 

where for ' $T_h$  - mill tolerance" we will use the measured wall thickness adjacent to the flaw, 0.62 inches, d<sub>2</sub> is equal to d<sub>1</sub>, and t<sub>mh</sub> is as stated above

 $A_1 = (3.0)(0.62 - 0.080) = 1.62$  inches<sup>2</sup>

Since the available reinforcing area greatly exceeds the required reinforcing area:

 $A_1 = 1.62 > A_{req} = 0.26$  inches<sup>2</sup>,

the branch reinforcement rules of B31.1 are effectively satisfied and the through-wall flaw is considered structurally stable.

The piping stresses for longitudinal pressure + deadload + DBE loadings at node 970 was calculated as 1,711 psi in the design basis calculation (page J196), compared to an allowable of 34,380 psi (page 62). Since the through-wall flaw constitutes a relatively small reduction in the piping cross section the presence of the flaw is not significant.

In conclusion, the flaw is acceptable from a structural standpoint and occurs at a location of low service stress. Therefore it is acceptable for continued operation.

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Rev. 10 Page <u>24</u> of 24

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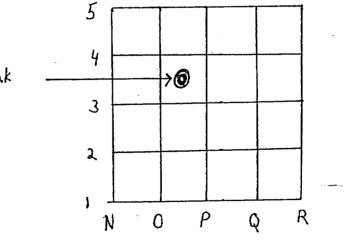
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00-CP-02958M2 Rev O pH of 18 AH. 3 pg. 1 of 4 Safety Evaluation Screen Form [+Comm. 4.1.6] (Sheet 1 of 4) Revision No. 00 Change No. NZ 44 1/26/. Document No.00-CP-02598M2 Unit 2 (Attachment 6 Provides Guidance) A. SUMMARY INFORMATION (Completed by the Preparer) 1. Description of the Proposed Change, Test or Experiment A degraded condition exists in Unit 2 service water piping spool piece, as documented in CR M2-00-0155. The degraded condition is a localized corrosion of the pipe pressure boundary, resulting in loss of pressure boundary thickness including a small region that is through-wall and permits leakage of service water. The degraded pipe wall is limited to a region about 2 inches in diameter. As permitted by NRC Generic Letter 90-05, an evaluation has been performed in accordance with criteria stated in the letter, with the conclusion that the flaw will remain structurally stable until a Code repair or replacement can be performed at the next outage. This safety evaluation screening is prepared relative to the determination of the flaw's structural integrity as documented in this calculation. The calculation and this screen do not address the compensatory actions to limit leakage or any other aspects of compliance with GL 90-05; these aspects are considered in DCN DM2-00-0039-00. B. SCREENING QUESTIONS (Completed by the Preparer) 1. Will implementation of the proposed Change, Test or Experiment require a revision to the Operating License or the Technical Specifications? (If "Yes," complete (a.), go to Section D and

Yes (OL or T/S change required) 🛛 No

- a. Reason OL or T/S change required and sections impacted:
- b. Reason OL or T/S change not required and sections reviewed:

Evaluation of degraded piping for continued operation is permitted by the NRC in accordance with GL 90-05. The process requires submittal of the evaluation to the NRC and is subject to NRC review and approval. A GL 90-05 request was most recently submitted for Unit 2 in 1994 under letter B14776. There are no licensing provisions or commitments which prohibit implementing the process at Millstone. Therefore the GL 90-05 evaluation is in accordance with the licensing basis, and no change to the license is required.

sign as Preparer - prior NRC review and approval is required. If "No," complete (b) and go to Question 2.)

Reviewed OL and T/S through change 253, T/S section 3/4.4.10.

Searched Licensing Commitment Database keywords "90-05", "flaw", "leak"

2. Is the proposed Change, Test or Experiment fully bounded by the scope of a previously approved Safety Evaluation? (Refer to Section B.2 of Attachment 6 to determine if fully bounded. If "Yes," complete (a.) and (b.), go to Section D and sign as Preparer - a new SE is not required. If "No," go to Question 3.)

🗌 Yes (new SE not required) 🔀 No

- a. Identification of previously approved SE:
- b. Reason previously approved SE fully bounds proposed activity:

RAC 12 Attachment 4 Rev. 2

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Unit _	2	Document No.00-CP-02598M2	Revision No. 00 Change No. NZ				
3.	(If "Yes, Questic	vious that the proposed Change, Test or l ," a SE is required – complete (a.), go to Section l on 4. If it is not clear, a SE is required.)	Experiment requires a Safety Evaluation?				
		s (SE required) 🛛 Not Obvious					
	a. Re	eason SE required:					
4.	<b>proceo</b> determi Prepare	the proposed activity meet the criteria of a dures as described in the SAR? (Refer to the ine if Non-intent. If a Non-intent Change, check " er - a SE is not required. If "No," go to Question 5	e guidance in Section B.4 of Attachment 6 to Yes," complete (a.) go to Section D, and sign as				
		s (SE not required) 🔀 No					
	a. Re	eason SE not required and SAR sections	reviewed:				
5.	(Per the activity modes go to Se	nplementation of the proposed activity mo e guidance in Section B.5 of Attachment 6, en- could directly or indirectly as a result of a sy or affect the function or reliability of equipme ection D and sign as Preparer a SE is required. S (SE required) X No	sure that you check "Yes" if the proposed stem interaction, introduce different failure nt described in the SAR. If "Yes," complete (a.),				
	a. Re	eason SE required and SAR sections imp	acted:				
	b. <i>Ba</i>	asis for "No" and SAR sections reviewed:					
	ac fla du ree	w is scheduled for corrective action at th	nents of 10CFR 50 Appendix B. Since the e next available outage of sufficient eric Letter 91-18 Rev.1 the flaw itself is not				
		eviewed UFSAR through change 57, 7/16 ange 53, 1/6/00.	i/99, Section 9.7, and TRM through				
6.	(Refer If "Yes,	to the list of supplemental questions in Section B	<b>dify procedures as described in the SAR?</b> 6 of Attachment 6 to evaluate the need for a SE. arer - a SE is required. If "No," complete (b.) and go				
	🗌 Ye	s (SE required) 🛛 No					
	a. Re	eason SE required and SAR sections imp	pacted:				
		asis for "No" and SAR sections reviewed					
	Tł Gl	ne evaluation of the flaw was performed on L 90-05 evaluations, specification SP-ST	consistent with the existing procedure for -ME-947 Rev. 1. There are no procedural RAC 12 Attachment 4				

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	ہ 3، م AH. 3 Safety Evaluation Screen Form [+Comm. 4.1.6]
Unit <sub>.</sub>	(Sheet 3 of 4) 2 Document No.00-CP-02598M2 Revision No. 00 Change No.
	changes required for evaluation of the flaw. Therefore there are no required changes to procedures as described in the SAR.
	Reviewed UFSAR through change 57, 7/16/99, Chpt. 12 and Section 9.7, and T through change 53, 1/6/00.
7.	Will implementation of the proposed activity involve a Test or Experiment <i>not</i> describ the SAR? (Refer to the list of examples in Section B.7 of Attachment 6 to determine the need for a S "Yes," complete (a.), go to Section D and sign as Preparer - a SE is required. If "No," complete (b.), g Section D and sign as Preparer.)
	Yes (SE required) 🛛 No
	a. Reason SE required:
	b. Basis for "No" and SAR sections reviewed:
	Evaluation of the flaw is a technical activity that does not itself affect operation of plant. The evaluation activity does not require operation of the plant in any spectrum manner, and there are no required plant parameter changes. Therefore there is Test or Experiment associated with the flaw evaluation.
	Reviewed UFSAR through change 57, 7/16/99, Chpt. 13 and Section 9.7, and T through change 53, 1/6/00.
C. SI	JMMARY (Completed by the Approver)
1.	Is a revision to the technical specifications or operating license required? ("Yes, if Ques B.1 checked "Yes")
2.	Is a Design Engineering Screening Evaluation per the Design Change Manual Require (Yes, if proposed Change is an Intent Change to the Facility as described in the SAR)
3.	Is a new Safety Evaluation required? (Yes, if Question B.1, B.3, B.5, B.6 or B.7 is checked "Yes
4.	Is a FSARCR per RAC 03 necessary? (Yes, if responses to Question B.5 or B.6 indicate propose activity will cause the FSAR description to be incorrect)
5.	Is the proposed activity fully bounded by a previously approved Safety Evaluation? (Y Question B.2 is checked "Yes")
6.	Is the Quality Assurance Plan, Emergency Plan or Security Plan affected, requiring an evaluation per RAC 01? (Yes, if response to Question B.5, B.6, or B.7 identifies these portions of SAR as being affected by the proposed activity)

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RAC 12 Attachment 4 Rev. 2

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	Reviewer:				
	(if required)	N/A		,	Date:
			Print and Sign		
					//
	Approver:	Poloy Kaky	1 Mahulas	redo	Date: 1/26/00
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DETAIL	TACHED SKETCH ED UT DATA.	FOR	5		Separately		(ness
DETAIL	TACHED SKETCH ED UT DATA.	FOR	5	→ O	Separately	e Coating Thick	(ness
DETAIL	TACHED SKETCH ED UT DATA. KNOWN LEAK	FOR	5		Separately		
DETAIL AREA OF	TACHED SKETCH ED UT DATA. KNOWN LEAK	FOR	5		Separately	Date 3/3	.190
DETAIL	TACHED SKETCH ED UT DATA. KNOWN LEAK S sign) TODD A. BOHNENKA	FOR	5		Separately		.190

Level of Use

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Northeast Nuclear Energy	GENERIC NDE SKETCH SHEET Page 2 of 3 Procedure No. NO-OT-5 Rev. 10 PCN N/A
Plant MILLSTONE Unit System 2326 A Component ID SK0923 THICKNESS DATA OBTAINED OF LEAK. READINGS CONT	Cal. Data Sheet # N/A Exam. Data Sheet # N/A AWO NO. M2-00-03495 D AT 1/4" INTERVALS BEGINNING AT AREA TINUE UNTIL T-NOM IS ACHIEVED.
SKETCH IS ORAWN TO ACTI	$ \begin{array}{c}        $
Examiner Comments REF. PREVIC	OUS NATA FOR ORIGINAL UT DATA.
Examiner Signature (Print/Sign <u>) Toop Borine</u> Reviewer (Print/Sign <u>) R.J. F. IIe-</u> NII If Required (Sign)	

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Northeast Nuclear Energy		COATING THICK	NESS EXAN	DATA SHEET
Plant <u>MILLSTONE</u> Unit System <u>2326 A</u> Zone AWO No. <u>M2-00-0349</u> Exam. Purpose <u>ENG</u> , <u>INFORMATION</u> Thickness Meter Make/Model <u>FISCHER / DELTASOPE</u> RE/PMMS No. <u>RE 1700</u> Serial Number <u>042-12554 A</u> Calibration Range <u>093 - 25.8 MILS</u>	N/A 15 J	Design DWG Number Component Description Component Identification Pipe Size Micrometer Micrometer PMMS No Serial Number Calibration Due Date	5000 PIECE 5K092 24" 0A24 QA243	3 
Readings       1       1       2         2 $9.65$ 3         3 $9.26$ 4         4 $11.9$ 5         5 $9.92$ 6         6 $9.80$ 7         7 $9.65$ 8         8 $9.47$ 9         9 $11.0$ 10         10 $10.7$ 10         Coating Thickness Minimum 8.5         Comments $N/A$ State of the sign Toob A. BOHNENKAME	12         13         14         15         16         17         18         19         20	$ \begin{array}{cccccccccccccccccccccccccccccccccccc$	9.94	
Reviewer (print & sign) R. J. F. J. [. ingineering Reviewer (print & sign) NII (when applicable) evel III or Designee Signature for Certification	N/A	Lev	el el eN/A	
even in or Designee Signature for Certification	NA			Date N/A

Ealc.	Attachment 4 P.4 . f.4 00-CP-0295BM2 Rev. 01 P. 26 of 26
Northeast Nuclear Energy	GENERIC NDE SKETCH SHEET Page 2 of 3 ure No. NO-UT-5 Rev. 10 PCN N/A
Plant MILLSTONE Unit 2 System 2326 A Component ID SK0923 THICKNESS DATA OBTAINED AT 10	Cal. Data Sheet #       N/A         Exam. Data Sheet #       N/A         AWO No.       M2-00-03495
SKETCH IS ORAWN TO ACTUAL SI	$\begin{array}{c} 0.0112  1-NOA  15  ACHIE UED. \\ ze. \\ 0.01 \\ 0.0$
Examiner Comments REF. PREVIOUS DATA	FOR ORIGINAL UT DATA.
aminer Signature (Print/Sign <u>) TOOD BOHNENKAMPEe</u> viewer (Print/Sign) R.J. F. He- M III If Required (Sign) N/A	Level II Date 3/2/00 Nulles Level II Date 3/2/00 Date N/A